

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

Dominique Lundy,

Debtor.

Case No. 23-12839-amc

Chapter 13

**Debtor's Motion to Determine Value of Property and Allowed
Secured Claim of Toyota Motor Credit Corporation**

AND NOW, Debtor Dominique Lundy, by and through her attorney, moves this Court to determine value of property. In support of this motion, the Debtor states as follows:

1. The Debtor filed this case under chapter 13 on September 20, 2023.
2. On August 18, 2018, the Debtor entered into a retail installment contract ("the Loan") for the purchase of a 2010 Lexus RX, VIN JTJBC1BA2A2004565 ("the Car"), which is assigned to Toyota Motor Credit Corporation ("the Creditor").
3. The Creditor filed Claim No. 6 in the total amount of \$14,762.08 of which \$11,900.00 is secured by the Car. Exhibit A.
4. The Kelley Blue Book value of the Car is \$7,689.00. Exhibit B.
5. Because the Car was purchased more than 910 days before this case was filed, it can be considered for a "cram down" at its current value. 11 U.S.C. § 506(A)(2).
6. The Court must determine that the value of the Car is \$7,689.00, and that the secured component of Claim No. 6 must be paid according to that value.

NOW, THEREFORE, the Debtor asks this Court grant relief in the form of order attached and to grant such other relief in their favor as may be necessary and proper under the law.

Date: January 10, 2024

CIBIK LAW, P.C.
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